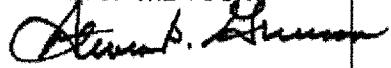


EXHIBIT “A”

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1 COM
2 GEORGE T. BOCHANIS, ESQ.
3 Nevada Bar No. 2262
4 **GEORGE T. BOCHANIS, LTD.**
5 631 So. Ninth Street
6 Las Vegas, Nevada 89101
7 Telephone: (702) 388-2005
8 Facsimile: (702) 388-0484

CASE NO: A-19-790568-C
Department 30

9 Attorneys for Plaintiffs

10 **DISTRICT COURT**

11 **CLARK COUNTY, NEVADA**

12 CONNIE PEREZ, individually;
13 RAMIRO LOPEZ, individually; and MIGUEL
14 PEDROZA, individually

Case No.:

Dept. No.:

15 Plaintiffs,

16 v.

17 FIRST FLEET, INC., an unknown business and/or
18 corporate entity and DOE DRIVER I, individually,
19 and DOES I through X; and ROE
20 CORPORATIONS I through X, inclusive,

21 Defendants.

22 **COMPLAINT**

23 Plaintiffs, CONNIE PEREZ, RAMIRO LOPEZ and MIGUEL PEDROZA, by and
24 through their attorney, GEORGE T. BOCHANIS, ESQ., of the Law Offices of **GEORGE T.**
25 **BOCHANIS, LTD.**, complain and allege as follows:

26 **FIRST CAUSE OF ACTION**

27 **I.**

28 That Plaintiff, CONNIE PEREZ ("Plaintiff"), was a resident of Clark County, Nevada.

29 **II.**

30 That Plaintiff, RAMIRO LOPEZ ("Plaintiff"), was a resident of Clark County, Nevada.

31 **III.**

32 That Plaintiff, MIGUEL PEDROZA ("Plaintiff"), was a resident of Clark County,
33 Nevada.

IV.

That Defendant FIRST FLEET, INC., was a Domestic Business Corporation and/or Limited Liability Company, duly authorized to conduct business in the County of Clark, State of Nevada.

V.

6 That the true names and capacities of Defendants named herein as DOES I through X,
7 inclusive, are unknown to Plaintiffs, who therefore sue said Defendants by such fictitious names.
8 Plaintiffs are informed and believe and thereon allege that each of the Defendants designated
9 herein as a DOE is responsible for the events and happenings referred to resulting from the
10 subject motor vehicle collision and caused damages proximately to Plaintiffs as alleged herein.
11 Plaintiffs will ask leave of Court to amend the Complaint to insert the true names and capacities
12 of DOES I through X, inclusive, when the same have been ascertained, and to join such other
13 Defendants in this action.

VI.

15 That at all times mentioned in this Complaint, Defendants FIRST FLEET, INC., and
16 each of them, were the registered owners of a motor vehicle involved in this subject collision,
17 described as a Volvo cab Tractor-Trailer Truck, having Tennessee license plate number
18 C3174HY, which was being driven by Defendant DOE DRIVER I at all times relevant herein.

VII.

20 That on or about March 23, 2017, Defendant DOE DRIVER I, was acting and conducting
21 himself as an employee, agent, manager, representative and/or permissive driver of Defendants,
22 FIRST FLEET, INC., and each of them, and therefore, said Defendants are responsible and liable
23 for all damages caused by Defendant DOE DRIVER I.

VIII.

25 That on or about March 23, 2017, Defendants, FIRST FLEET, INC., and each of them,
26 negligently and carelessly managed, maintained and entrusted said tractor-trailor truck by

1 allowing its operation by Defendant DOE DRIVER I, and by striking and colliding with the
2 vehicle occupied by Plaintiffs, which caused them each damages as hereinafter set forth.

3 **IX.**

4 That as a direct and proximate result of the aforesaid negligence of Defendants, and each
5 of them, Plaintiffs each suffered personal injury receiving both internal and external injuries and
6 great pain, suffering, shock and anxiety and were required to incur expenses to employ the
7 services of physicians and to procure x-rays, medicine and general medical care and attention.
8 That as a result of the aforesaid actions, Plaintiffs have each suffered damages in a sum in excess
9 of \$15,000.00.

10 **SECOND CAUSE OF ACTION**

11 **X.**

12 Plaintiffs repeat and reallege all of the paragraphs previously contained in this Complaint
13 as though fully set forth herein.

14 **XI.**

15 That at all times alleged herein, Defendants FIRST FLEET, INC., and each of them, were
16 negligent in failing to properly hire, train, supervise and retain their employees, agents and
17 representatives who were the driver(s) involved in this motor vehicle collision.

18 **XII.**

19 That as a direct and proximate result of the negligent hiring, training, supervision and
20 retention by Defendants, and each of them, of their driver in this subject motor vehicle collision,
21 Plaintiffs are entitled to an award of damages in excess of \$15,000.00.

22 **XIII.**

23 Plaintiffs have also incurred property damage, future rental/replacement vehicle costs, loss
24 of use of the vehicle involved in this subject collision and other incidental damages in a sum to
25 be determined at the time of trial.

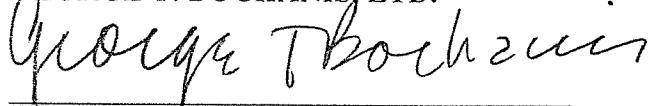
26 ...

27 ...

1 WHEREFORE, Plaintiffs, CONNIE PEREZ, RAMIRO LOPEZ and MIGUEL
2 PEDROZA, pray for judgment against Defendants, and each of them, as follows:

3 1. For general and special damages in a sum in excess of \$15,000.00 each;
4 2. For attorney's fees as provided by Nevada Revised Statutes;
5 3. For legal pre-judgment interest at the highest rate allowable;
6 4. For costs of suit herein; and
7 5. For such other and further relief as this Court may deem just and proper under the
8 circumstances.

9 DATED this 6th day of March 2019.

10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27
10 GEORGE T. BOCHANIS, LTD.
11 
12 GEORGE T. BOCHANIS, ESQ.
13 Nevada Bar No.: 2262
14 631 So. Ninth Street
15 Las Vegas, Nevada 89101
16 Attorney for Plaintiffs